

# 510(K) SUMMARY

NOV 21 2007

Date Prepared:	June 15, 2007
Submitter:	Medtronic, Inc. Cardiac Rhythm Disease Management 710 Medtronic Parkway Minneapolis, MN 55432-5604
Contact:	Sara Christiansen Senior Regulatory Affairs Specialist
Telephone:	(763)505-7864
Fax:	(763)505-7877
E-mail:	sara.christiansen@medtronic.com
Proprietary Name:	Reveal DX Insertable Cardiac Monitor Reveal Patient Assistant
Common Name:	Insertable Cardiac Monitor
Device Classification	Class II, 21 CFR 870.1025, Arrhythmia detector and alarm
Product Code:	DSI

## Summary of Substantial Equivalence

The intended use, design, materials and performance of the Reveal DX Insertable Cardiac Monitor (Model 9528) are substantially equivalent to the following predicate devices:

- Medtronic Reveal Plus (Model 9526) ILR - K994331, Cleared 21 January 2000/K003667, Cleared 14 February 2001
- Novacor Vista Plus Holter Recorder - K042108, Cleared 19 January 2005
- IM Systems Actitrac Activity Monitor - K992410, Cleared 15 October 1999
- Invivo Corporation Model 3160 MRI Patient Monitor (MRI compatible multiparameter patient monitor) - K053462, Cleared 18 January 2005

The intended use, design, materials and performance of the Reveal Patient Assistant (Model 9538) are substantially equivalent to the following predicate device.

- Medtronic Model 6191 Patient Activator - K994331, Cleared 21 January 2000/  
K003667, Cleared 14 February 2001

## **Device Description**

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The Reveal DX Model 9528 Insertable Cardiac Monitor (ICM) is designed to automatically record the occurrence of arrhythmias in a patient. Arrhythmia may be classified as bradyarrhythmia, asystole, or (fast) ventricular tachyarrhythmia. The Reveal DX ICM provides storage of ECG and marker channels during patient-activated and automatically-detected (auto-activated) events. Auto activation may help to detect abnormal heart rhythms in patients who may not activate/trigger the ICM.

The Reveal DX ICM Model 9528 is a small, leadless device that is typically implanted under the skin, in the chest. Two electrodes on the body of the device continuously monitor the patient's subcutaneous ECG.

The Reveal Patient Assistant Model 9538 is a hand-held, battery-operated telemetry device that enables the patient to start recording cardiac information in the Reveal DX ICM after experiencing symptoms of a possible cardiac event.

## **Indications for Use**

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The Reveal DX Insertable Cardiac Monitor is an implantable patient-activated and automatically-activated monitoring system that records subcutaneous ECG and is indicated in the following cases:

- patients with clinical syndromes or situations at increased risk of cardiac arrhythmias
- patients who experience transient symptoms that may suggest a cardiac arrhythmia

The Patient Assistant is intended for unsupervised patient use away from a hospital or clinic. The Patient Assistant activates one or more of the data management features in the Reveal Insertable Cardiac Monitor:

- To verify whether the implanted device has detected a suspected arrhythmia or device related event.
- To initiate recording of cardiac event data in the implanted device memory.

## **Technological Characteristics**

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Intended use, design, materials, performance and technological characteristics are substantially equivalent to the predicate devices referenced.

## **Summary of Testing**

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Device verification testing was performed to demonstrate the Reveal DX Model 9528 Insertable Cardiac Monitor and Reveal Patient Assistant Model 9538 meet established performance criteria and to support equivalency to the reference predicate devices. Electromagnetic compatibility (EMC), electrical safety, component, environmental handling, sterilization, firmware, MRI compatibility and sensing and detection performance validation testing were completed for the Reveal DX Model 9528 Insertable Cardiac Monitor. Functional and mechanical performance testing, firmware testing and usability testing was completed for the Reveal Patient Assistant Model 9538. System verification and validation and packaging testing were also completed. The results of the testing indicate that the Reveal DX Insertable Cardiac Monitor Model 9528 and Reveal Patient Assistant Model 9538 perform as intended and are safe for their intended use.

Biocompatibility testing was not required because blood-contacting materials of the Reveal DX Model 9528 Insertable Cardiac Monitor implanted device are similar to the predicate device, the Medtronic Reveal Plus ILR.

The Reveal DX Model 9528 Insertable Cardiac Monitor will be sterilized using a validated EtO sterilization process.

## **Conclusion**

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Medtronic considers the Reveal DX Insertable Cardiac Monitor system to be substantially equivalent to legally marketed predicate devices through the data and information presented. No safety or effectiveness issues were identified.



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration  
9200 Corporate Boulevard  
Rockville MD 20850

NOV 21 2007

Medtronic, Inc.  
c/o Ms. Michelle Nivala  
Regulatory Affairs Specialist  
Cardiac Rhythm Disease Management  
8200 Coral Sea Street NW  
Mounds View, MN 55112

Re: K071655

Trade/Device Name: Reveal DX (Model 9528) and Reveal Patient Assistant (Model 9538)  
Regulation Number: 21 CFR 870.1025  
Regulation Name: Arrhythmia detector and alarm  
Regulatory Class: Class II (two)  
Product Code: DSI  
Dated: November 1, 2007  
Received: November 2, 2007

Dear Ms. Nivala:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

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Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050. This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Center for Devices and Radiological Health's (CDRH's) Office of Compliance at (240) 276-0120. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). For questions regarding postmarket surveillance, please contact CDRH's Office of Surveillance and Biometric's (OSB's) Division of Postmarket Surveillance at 240-276-3474. For questions regarding the reporting of device adverse events (Medical Device Reporting (MDR)), please contact the Division of Surveillance Systems at 240-276-3464. You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (240) 276-3150 or at its Internet address <http://www.fda.gov/cdrh/industry/support/index.html>.

Sincerely yours,



 Bram D. Zuckerman, M.D.  
Director  
Division of Cardiovascular Devices  
Office of Device Evaluation  
Center for Devices and  
Radiological Health

Enclosure

# INDICATIONS FOR USE

510(k) Number (if known): K071655

Device Name: Reveal DX Insertable Cardiac Monitor and Reveal Patient Assistant

Indications for Use: The Reveal DX Insertable Cardiac Monitor is an implantable patient-activated and automatically-activated monitoring system that records subcutaneous ECG and is indicated in the following cases:

- patients with clinical syndromes or situations at increased risk of cardiac arrhythmias
- patients who experience transient symptoms that may suggest a cardiac arrhythmia

The Reveal Patient Assistant is intended for unsupervised patient use away from a hospital or clinic. The Patient Assistant activates one or more of the data management features in the Reveal Insertable Cardiac Monitor:

- To verify whether the implanted device has detected a suspected arrhythmia or device related event.\*
- To initiate recording of cardiac event data in the implanted device memory.

\*only applicable to the Reveal XT Patient Assistant Model 9539

Prescription Use X

(Part 21 CFR 801 Subpart D)

AND/OR

Over-The-Counter Use \_\_\_\_\_

(21 CFR 807 Subpart C)

(PLEASE DO NOT WRITE BELOW THIS LINE-CONTINUE ON ANOTHER PAGE IF NEEDED)

Concurrence of CDRH, Office of Device Evaluation (ODE)



**Medtronic** Confidential

Donna R. Behnke  
(Division Sign-Off)  
Division of Cardiovascular Devices

510(k) Number K071655